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March 23, 2011

BY E-MAIL & REGULAR MAIL
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Re: In re McRay, Richardson, Santana, Wise and Salaam Litigation
03 Civ. 9685 (DAB)(RLL)

Dear Ms. Daitz:

Supplementing plaintiffs' list of Bates numbered documents to which you have asserted privilege and to which we object, I attach Exhibit G, which covers documents, which as far as we can determine from your privilege log, were created by non-parties to this action, and Exhibit H, which covers documents created by parties to this action.

Very truly yours,



Myron Beldock
On Behalf of All Plaintiffs' Counsel

MB:mc

cc: ACC Elizabeth W. Dollin, Esq (By E-Mail)
ACC Jessica Cohen, Esq. (By E-Mail)
ACC Andrew Myerberg, Esq. (By E-Mail)
ACC Genevieve Nelson, Esq. (By E-Mail)

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EXHIBIT G:

NYC038843-38854

NYC035625-35645

NYC032852

NYC049321-49326

NYC066998-67085

NYC067088

NYC067089-67093

NYC067095-67100

NYC067101-67119

NYC067122-67249

NYC067392-67396

EXHIBIT H:

NYC056269-56271
NYC056273-56276
NYC056306-56317
NYC056319
NYC056320-56327
NYC056819-56944
NYC056945-56947
NYC056948-57036
NYC057038-57057
NYC057113-57115
NYC022782-22805
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NYC022838
NYC022867-22885
NYC023018-23019
NYC023123
NYC023125-23127
NYC023516-23551
NYC023558-23576
NYC023577
NYC023578-23674
NYC023647-23657
NYC023658-23666
NYC023667-23669
NYC023670-23755
NYC023757
NYC023758-23881
NYC023771-23881